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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SECOND SCHEDULING
STIPULATION WITH RESPECT TO
ANGELA RAMIREZ'S MOTION FOR
RELIEF FROM AUTOMATIC STAY**

Related Docket No.: 11936

1 **WHEREAS**, on January 29, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas
2 and Electric Company (the “**Utility**” and, together with PG&E Corp., the “**Debtors**” or
3 “**Reorganized Debtors**,” as applicable), commenced with the Court voluntary cases under chapter
4 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). The *Debtors’ and Shareholder*
5 *Proponents’ Joint Chapter 11 Plan of Reorganization dated June 19, 2020* [Docket No. 8048]
6 (the “**Plan**”) was confirmed by Order of the Court dated June 20, 2020 [Docket No. 8053] (the
7 “**Confirmation Order**”). The Plan became effective on July 1, 2020.

8 **WHEREAS**, on February 16, 2022, Angela Ramirez (“**Ramirez**,” and together with the
9 Reorganized Debtors, the “**Parties**”) filed the *Motion for Relief from Automatic Stay* [Docket
10 No. 11936] (the “**Motion**”), which noticed a response deadline of March 1, 2022, and a hearing date
11 of March 15, 2022 (the “**Hearing Date**”).

12 **WHEREAS**, on February 25, 2022, the Parties filed a *Scheduling Stipulation with Respect*
13 *to Angela Ramirez’s Motion for Relief from Automatic Stay* [Dkt. No. 11974] (the “**Stipulation**”),
14 which the Court approved on February 28, 2022 [Dkt. No. 11978].

15 **WHEREAS**, the Stipulation provided that the Hearing Date was continued to March 29,
16 2022, with the Reorganized Debtors’ response to the Motion due by March 15, 2022.

17 **WHEREAS**, the Parties have conferred and agreed to a further revised schedule for the
18 Motion.

19 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, THROUGH THE**
20 **UNDERSIGNED, THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**
TO ORDER THAT:

21 1. The Hearing Date shall be continued to **April 12, 2022**, at 10:00 am (Prevailing
22 Pacific Time). The March 29, 2022 hearing on the Motion is taken off the Court’s calendar.

23 2. Reorganized Debtors’ response to the Motion must be filed with the Court by
24 March 29, 2022.

25 3. Nothing herein prevents the Parties from agreeing to a further adjustment of the
26 above schedule, subject to Court approval.

1 4. This Stipulation shall constitute the entire agreement and understanding of the
2 Parties relating to the subject matter hereof.

3 5. This Stipulation may be executed in counterparts, each of which shall be deemed an
4 original but all of which together shall constitute one and the same agreement.

5 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
6 controversies arising from this Stipulation.

7
8
9 Dated: March 14, 2022

Dated: March 14, 2022

10 KELLER BENVENUTTI KIM LLP

FORTHRIGHT LAW, P.C.

11 /s/ David A. Taylor

/s/ Dow W. Patten

12 David A. Taylor

Dow W. Patten

13 *Attorneys for Debtors*
14 *and Reorganized Debtors*

Attorneys for Angela Ramirez